

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

JPMorgan Chase Bank, N.A. successor by merger)	
To Chase Home Finance, LLC)	
<i>Plaintiff</i>)	C.A. No. 1:24-cv-00478
)	
v.)	
)	
ROBERT CARVER, JR., a/k/a Robert G. Carver)	
et al.)	
<i>Defendants,</i>)	
)	
United States of America, et al.)	
<i>Parties-in-Interest</i>)	

NOTICE OF REMOVAL

**TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND:**

1. A Complaint brought by Plaintiff, JPMorgan Chase Bank, N.A., for Interpleader, to deposit surplus funds following a foreclosure of a mortgage concerning property located at 15 South River Drive, Narragansett, Rhode Island, 02882 (the “Property”), against the United States, acting on behalf of the United States Internal Revenue Service, has been filed in Washington Superior Court.

2. The document attached as Exhibit A to this Notice is a copy of the Summons and Complaint received by the Office of Litigation in Washington, D.C., for the Internal Revenue Service, on or about October 29, 2024. The Rhode Island United States Attorney’s Office, received said document on or about October 29, 2024.

3. The facts as alleged in the Complaint in the above-action represent a civil action commenced in state court for Interpleader involving property against which the United States of America has or claims a mortgage or other lien, and in which the United States is named as a Defendant. Such action may be removed pursuant to 28 U.S.C. §§ 2410, 1444 and/or 28 U.S.C. § 1442.

4. Since the Summons was received by the United States on or about October 29, 2024, Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

5. Notice of removal has been provided this date to Plaintiff and the Clerk of the State of Rhode Island, Washington County Superior Court.

6. No defenses, including immunity, are waived by the filing of this Notice of Removal.

Wherefore, notice is respectfully given that the captioned matter is removed to the United States District Court for the District of Rhode Island pursuant to 28 U.S.C. §§ 1442 and 1444. In accordance with 28 U.S.C. § 1446(d), the filing of a copy of this Notice with the Clerk of Court for the Washington Superior Court of the State of Rhode Island and issuance of notice to all adverse parties shall effect the removal, and the state court shall proceed no further with respect to this action unless and until the case is remanded thereto.

Respectfully submitted,

UNITED STATES OF AMERICA

By its Attorneys,

ZACHARY A. CUNHA
United States Attorney

s/ Daniel M. Caves
DANIEL M. CAVES
Trial Attorney
U.S. Department of Justice
Civil Trial Section, Northern Region
P.O. Box 55
Washington, D.C. 20044
(202) 514-6058
(202) 514-5238 (fax)
Daniel.M.Caves@usdoj.gov

s/ Kevin Love Hubbard
KEVIN LOVE HUBBARD
Assistant U.S. Attorney
United States Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903
(401) 709-5000
(401) 709-5001 (fax)
Email: kevin.hubbard@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of November, 2024, I caused a copy of the within Notice of Filing of Removal to be forwarded, by postage prepaid mail, to:

Robert G. Carver
15 Riviera Drive
Narragansett, Rhode Island 02882

Linda A. Carver
15 Avicce Street
Narragansett, Rhode Island 02882

/s/ Kevin Hubbard
Kevin Hubbard